



11-21-83

STATE OF ARKANSAS  
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY  
8001 NATIONAL DRIVE, P.O. BOX 9583  
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

CERTIFIED MAIL: RETURN RECEIPT REQUESTED P13 6708483

November 21, 1983

Mr. Wendell L. Fortner  
Environmental Coordinator  
Department of the Army  
Pine Bluff Arsenal  
Pine Bluff, Arkansas 71611

RE: EPA I.D. #AR 02138207077

Dear Mr. Fortner:

Your application for a state hazardous waste management permit was received on October 20, 1983. In accordance with prescribed policy, your application has been reviewed and determined to be substantially complete, and processing of your application has commenced.

However, during the completeness review, a few deficiencies were noted as shown below:

- a. Item C-2d of the waste analysis plan states a composite sample of baghouse dust will be taken. We would like to know what procedure will be used to take the composite sample.
- b. In the inspection requirements, specific items (temperature sensor, bypass controls, alarms, etc) were listed along with the frequency of inspection and the reason for inspection. However, there was no inspection schedule for the gross pieces of equipment. For example, although there were inspection protocols for individual pieces of the incinerators, there was no proposed inspection of the incinerator itself.
- c. On page F-13 of the application you state that no waiver of preparedness will be requested under 40 CFR 270.14(b)(6). Nevertheless, you are still required to demonstrate that the facility will meet the requirements of 40 CFR 264.32 and 264.35.
- d. The hazard assessment listed on page G-6 of the application needs to be clarified and/or expanded to fit this specific case.
- e. The application does not demonstrate that the requirements of 40 CFR 264.37 will be met. Copies of the signed Mutual Support Agreements will probably provide the needed demonstration.
- f. On page G-23, in Section G-8, and on page I-7, in Section I-10 the words "Regional Administrator" needs to be changed to "Director".

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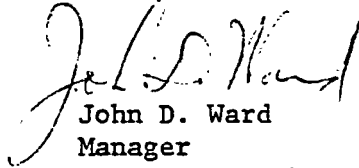
Mr. Wendell L. Forster  
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- g. The closure plan for the incinerators does not adequately demonstrate that all hazardous waste and hazardous waste residue will be removed from the site. Specifically, your proposal to burn the waste residue raises the question of what will happen to the residue created from burning the residue? This section is also misnumbered; I-1d(3) refers to closure of waste piles, I-1d(4) refers to surface impoundments, and I-1d(5) is the section that deals with incinerator closure.

There is no time requirement on the submission of this information; however, we cannot complete the drafting of your permit until they are received. If any additional information is required, you will be contacted by our reviewing engineer.

Thank you for your cooperation. If you have any questions concerning this submittal, please contact Mike Porta at (501) 562-7444, ext. 310.

Sincerely,

  
John D. Ward  
Manager  
Permits Branch

JDW:cjh

cc: Mike Porta, Engineer, Air & Hazardous Materials Division

11/21/83 2:00 p.m.

Irrigation acreage and private well population at Pine Bluff Arsenal area

T. C. Perdue *T. C. Perdue*  
Environmental Scientist, 6AW-SO

FILE [Pine Bluff Arsenal], AR

On November 21, 1983 at 2:00 p.m. I talked by telephone with Gus Ludwig (501) 378-6391 of the U.S. Geological Service. I recieved the folowing information:

1. Commercial and municipal wells in area are in Sparta Sands aquifer with minimum depth of 850 ft.
2. Majority of private wells in upper alluvial, with depths from 60 to 100 ft.
3. Upper aquifer and Sparta Sands separated by several layers of confining clay, no hydraulic connections.
4. There is some acreage used for farming with groundwater irrigation. Crops are cotton and soybeans. Average acres 2500.
5. It is estimated that 20% of poulation in area (excluding Arsenal Base and city of Pine Bluff) are still on private wells.

*Handwritten: 11/21/83 2:00 p.m.*

11/21/83 9:12 a.m.

Water Supply at Pine Bluff Arsenal, White Hall

T.C. *Perdue*  
Environmental Scientist, 6AW-SO

FILE Pine Bluff Arsenal, AR

On November 21, 1983 I talked by telephone with Harold Siefert of Arkansas Department of Health (ADH), (501) 661-2623. I obtained the following information:

1. Pine Bluff Arsenal wells are finished in the Sparta Sands average depth 1085 ft.
2. City of White Hall has two wells at 865 and 904 ft deep.
3. Some homes in area located adjacent to base are using private wells.